EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA, Plaintiff, v. LI SHAOMING, MO HAILONG, also known as Robert Mo, WANG LEI, WANG HONGWEI, YE JIAN, LIN YONG, and MO YUN Defendants.	))))))))	Case No. 4:13-CR-147 SUBPOENA TO PRODUCE DOCUMENTS

To: Monsanto
800 N. Lindbergh Blvd.
Saint Louis, MO 63167-0001

__ **YOU ARE COMMANDED** to appear in the United States District Court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: United States Courthouse 123 East Walnut Street, Room 455 Des Moines, Iowa	Date and Time:

X **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: **See attached Exhibit A and Superceding Indictment.**

Place: Weinhardt & Logan, P.C. 2600 Grand Avenue, Suite 450 Des Moines, IA 50312	Date and Time: February 13, 2015, at 1:00 p.m.

CLERK OF COURT

[signature]
Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorneys representing Mo Hailong, who issue or request this subpoena, are: Mark E. Weinhardt and Holly M. Logan, Weinhardt & Logan, P.C., 2600 Grand Avenue, Suite 450, Des Moines, IA 50312, mweinhardt@weinhardtlogan.com, hlogan@weinhardtlogan.com, (515) 244-3100.

ATTACHMENT A

I
DEFINITIONS

A. "Monsanto" means the Monsanto Company, as identified in paragraph 12 of the Superseding Indictment.

B. "You" and "your" means Monsanto, and all persons or entities acting on its behalf or under its direction or control, including, without limitation, subsidiaries, affiliates, employees, partners, agents, representatives, independent contractors, accountants and attorneys.

C. "DBN" means Beijing Dabeinong Technology Group Company and all persons or entities acting on its behalf or under its direction or control, including, without limitation, its North America subsidiary DBN North America, Inc., and other subsidiaries, affiliates, employees, partners, agents, representatives, independent contractors, accountants and attorneys.

D. "BKN" means Beijing Kings Nower Seed Science & Technology Co. Ltd. and all persons or entities acting on its behalf or under its direction or control, including, without limitation, its North America subsidiary Kings Nower North America Company, Inc., and other subsidiaries, affiliates, employees, partners, agents, representatives, independent contractors, accountants and attorneys.

E. "Superseding Indictment" means the Superseding Indictment filed on July 2, 2014, against Mo Hailong (also known as Robert Mo), Mo Yun, and others, in the federal case *United States v. Li, et al.*, Case No. 13-cr-147, in the United States District Court for the Southern District of Iowa.

F. "Mo Hailong Criminal Complaint" means the Criminal Complaint filed on December 10, 2013 against Mo Hailong (also known as Robert Mo) in the federal case *United States v. Mo Hailong*, Case No. 13-mj-267, in the United States District Court for the Southern District of Iowa.

G. "Mo Yun Criminal Complaint" means the Criminal Complaint filed on July 1, 2014 against Mo Yun in the federal case *United States v. Mo Yun*, Case No. 14-mj-160, in the United States District Court for the Southern District of Iowa.

H. "Defendants" means the defendants charged in the Superseding Indictment, including Li Shaoming, Mo Hailong, Wang Lei, Wang Hongwei, Ye Jian, Lin Yong, and Mo Yun.

I. "Mo Matter" means the pre- and post-indictment investigation of certain allegations of trade secret theft (including corn germplasm and other corn-breeding-related information) by law enforcement authorities detailed in the Superseding Indictment, Mo Hailong Criminal Complaint and Mo Yun Criminal Complaint.

J. "Government" means any and all agents or representatives of federal, state or local government departments, agencies or offices, including but not limited to the United States Department of Justice (including the Offices of the United States Attorney), the Federal Bureau of Investigation, the United States National Security Agency, the United States Central Intelligence Agency, the Department of Homeland Security (including Customs and Border Protection), the United States Department of Agriculture, and the Polk County (Iowa) Sheriff's Department.

K. "Security Measures" means those steps taken by you to protect your intellectual property or other proprietary information relating to corn germplasm and other corn-breeding-related information.

L. "Field Corn" means every variety of maize in the United States that is not grown primarily for consumption as human food in the form of fresh kernels or not grown primarily as popcorn; *i.e.,* all varieties of maize besides sweet corn or popcorn.

M. "Communications" means the transmittal, exchange or disclosure of information (in the form of facts, inquiries or otherwise), as reflected, memorialized, notated or otherwise recorded in electronically-stored information or other documentary form.

N. "Documents" means materials producible under the Federal Rules, including materials that are written, printed, recorded, or produced and/or maintained electronically.

O. "Person" is defined as any natural person or any business or organization, including any legal, governmental, for profit and not-for-profit entity or association.

P. The term "concerning" means regarding, relating to, referring to, describing, depicting, evidencing or constituting.

II
INSTRUCTIONS

A. Produce all responsive documents in your possession, custody or control, and as they are kept in the ordinary course of business.

B. If you are unable to produce in full any responsive document, (i) produce each such document to the fullest extent possible; (ii) specify the reasons for your inability to produce the remainder; and (iii) state in detail all of your information and belief about the location and substance of the document.

C. If any responsive document was at one time, but is no longer, in your possession, custody or control, (i) identify each such document; (ii) specify why the document is no longer in your possession, custody or control; and (iii) state in detail all of your information and belief about the location and substance of the document.

D. If any responsive document (or a portion thereof) is withheld on the basis of privilege, identify the following for each such document: (i) date; (ii) author; (iii) addressees; (iv) other recipients; (v) relationship of the author, addressees and recipients to each other, if not readily apparent; (vi) document type (e.g., letter or memorandum); (vii) general subject matter; and (viii) nature of the claimed privilege.

E. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

F. The use of the singular form of any word includes the plural and vice versa.

III
ITEMS REQUESTED

Contacts and Communications Concerning Defendants, DBN and BKN

1. Communications and documents (including visitor requests, entry logs, agendas, and tour itineraries) concerning visits or potential visits by the Defendants and employees of DBN or BKN to Monsanto's facilities in the United States, including your headquarters in St. Louis, MO and your facilities in Ankeny, IA, from January 1, 2007 through December 11, 2013, including:

   a. Li Shaoming's requests in July and August 2007 concerning a potential visit to Monsanto's facilities in September 2007;

   b. Mo Hailong's visit to Monsanto's facilities in or about September 2007;

   c. Mo Hailong's visit to Monsanto's facilities in or about October 2010;

   d. Mo Hailong and Wang Lei's visit to Monsanto's facilities in or about April or May 2011;

   e. Mo Hailong, Li Shaoming and Wang Lei's visit to Monsanto's facilities in or about September 2011, including a visit on or about September 19, 2011; and

   f. Mo Hailong and Wang Lei's visit to Monsanto's facilities in or about February 2012, including a visit to Monsanto's Ankeny facility on or about February 15, 2012.

2. Communications and documents (including letters in support and drafts thereof) concerning assistance or potential assistance provided by Monsanto to the Defendants and employees of DBN or BKN in obtaining visitor visas for trips to the United States from January 1, 2007 through December 11, 2013, including requests for assistance by Li Shaoming in 2007 and Li Shaoming and Wang Lei in 2011.

3. Communications and documents concerning discussions of potential cooperation, business engagements or information exchanges between Monsanto and DBN or BKN from January 1, 2006 through December 11, 2013, including:

a. discussions in or about December 2006 during the American Seed Trade Association Seed Expo in Chicago, IL;

b. discussions at the Gordon International Agriculture Conference in Ventura, California in or about March 2007;

c. discussions in or about September 2007 during and following a visit by Mo Hailong to Monsanto's headquarters in St. Louis, MO;

d. discussions in or about June 2008; and

e. discussions in or about October 2010 during and following a visit by Mo Hailong to Monsanto's headquarters in St. Louis, MO.

Security Measures Concerning Farmland Allegedly Containing Monsanto Field Corn

4. Documents concerning security measures taken with respect to the field in or around as referred to in paragraph 36 of the Superseding Indictment (the "), that was leased or owned by you in or about September 2011 or that was used for the testing or production of Monsanto field corn in or about September 2011, including:

    a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about September 2011, including documents concerning the contention attributed to Monsanto in paragraph 6 of the Mo Yun Criminal Complaint that the "was being utilized to grow inbred test seed for Monsanto;"

    b. documents and/or photographs concerning the containing descriptions or depictions of security measures, advertising, or posted notices on or adjacent to the property in or about September 2011; and

    c. grower agreements, leases, contracts or agreements, and communications between you and the owner of the , between you and any person engaged or retained by you to grow or test field corn on the or between you and any person engaged or retained by you to monitor or oversee the in or about September 2011, including but not limited to Vercel E. Barnes and Maties Mimo.

5. Documents concerning security measures taken with respect to the field in or around , as referred to in paragraph 49 of the Superseding Indictment (the), that was leased or owned by you in or about August 2012 or that was used for the testing or production of Monsanto field corn in or about August 2012, including:

    a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about August 2012;

b. documents and/or photographs concerning the containing descriptions or depictions of security measures, advertising, or posted notices on or adjacent to the property in or about August 2012; and

c. grower agreements, leases, contracts or agreements, and communications between you and the owner of the , between you and any person engaged or retained by you to grow or test field corn on the or between you and any person engaged or retained by you to monitor or oversee the , in or about August 2012.

6. Documents concerning security measures taken with respect to the field in or around , as referred to in paragraph 50 of the Superseding Indictment (the), that was leased or owned by you in or about August 2012 or that was used for the testing or production of Monsanto field corn in or about August 2012, including:

   a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about August 2012;

   b. documents and/or photographs concerning the containing descriptions or depictions of security measures, advertising, or posted notices on or adjacent to the property in or about August 2012; and

   c. grower agreements, leases, contracts or agreements, and communications between you and the owner of the , between you and any person engaged or retained by you to grow or test field corn on the or between you and any person engaged or retained by you to monitor or oversee the , in or about August 2012.

7. Documents concerning security measures taken with respect to the field in or around as referred to in paragraph 61 of the Superseding Indictment (the), that was leased or owned by you in or about September 2012 or that was used for the testing or production of Monsanto field corn in or about September 2012, including:

   a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about September 2012;

   b. documents and/or photographs concerning the containing descriptions or depictions of security measures, advertising, or posted notices on or adjacent to the property in or about September 2012; and

   c. grower agreements, leases, contracts or agreements, and communications between you and the owner of the between you and any person engaged or retained by you to grow or test field corn on the or between you and any person engaged or retained by you to monitor or oversee the in or about September 2012.

8. Documents concerning security measures taken with respect to the field in or around as referred to in paragraph 62 of the Superseding Indictment (the , that was leased or owned by you in or about September 2012 or that was used for the testing or production of Monsanto field corn in or about September 2012, including:

    a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about September 2012;

    b. documents and/or photographs concerning the containing descriptions or depictions of security measures, advertising, or posted notices on or adjacent to the property in or about September 2012; and

    c. grower agreements, leases, contracts or agreements, and communications between you and the owner of the between you and any person engaged or retained by you to grow or test field corn on the , or between you and any person engaged or retained by you to monitor or oversee the in or about September 2012.

9. Documents concerning security measures taken with respect to the field in or around as referred to in paragraph 63 of the Superseding Indictment (the , that was leased or owned by you in or about September 2012 or that was used for the testing or production of Monsanto field corn in or about September 2012, including:

    a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about September 2012;

    b. documents and/or photographs concerning the containing descriptions or depictions of security measures, advertising, or posted notices on or adjacent to the property in or about September 2012; and

    c. grower agreements, leases, contracts or agreements, and communications between you and the owner of the , between you and any person engaged or retained by you to grow or test field corn on the or between you and any person engaged or retained by you to monitor or oversee the in or about September 2012.

10. Documents concerning security measures taken with respect to the field in or around , as referred to in paragraph 64 of the Superseding Indictment (the), that was leased or owned by you in or about September 2012 or that was used for the testing or production of Monsanto field corn in or about September 2012, including:

    a. documents sufficient to identify the varieties of Monsanto field corn grown on the in or about September 2012;

b. documents and/or photographs concerning the containing descriptions or depictions of security measures, advertising, or posted notices on or adjacent to the property in or about September 2012; and

c. grower agreements, leases, contracts or agreements, and communications between you and the owner of the , between you and any person engaged or retained by you to grow or test field corn on the or between you and any person engaged or retained by you to monitor or oversee the , in or about September 2012.

11. Documents concerning all reports of trespass or suspected theft in fields leased or owned by you or fields used for the testing or production of Monsanto field corn from January 1, 2011 through December 11, 2013.

Security Measures Concerning Monsanto Field Corn for Sale

12. For the period from January 1, 2007 through December 11, 2013, all contracts, agreements, and communications with Aaron Mason or MFA Agri Services of Pattonsburg, Missouri (including its employees, agents and representatives), concerning sales of Monsanto field corn seed.

13. For the period from January 1, 2007 through December 11, 2013, all contracts, agreements, and communications with Whitney Mason or MFA Agri Services of Bethany, Missouri (including its employees, agents and representatives), concerning sales of Monsanto field corn seed.

14. Executed grower agreements, technology agreements, use restriction agreements or other agreements connected to the purchase or sale of Monsanto field corn seed received from the following locations from January 1, 2007 through December 11, 2013:

    a. MFA Agri Services in Pattonsburg, Missouri; and

    b. MFA Agri Services in Bethany, Missouri.

15. Documents sufficient to identify or describe when Monsanto began requiring purchasers of field corn seeds to sign technology agreements or use restriction agreements purporting to limit the manner in which purchasers use your seeds, as described generally in paragraphs 22.d and 23.h of the Superseding Indictment, including when Monsanto began requiring the execution of such agreements at MFA Agri Services in Pattonsburg, Missouri and MFA Agri Services in Bethany, Missouri.

Intellectual Property Information Concerning Alleged Seeds at Issue

16. Documents constituting or sufficient to identify (i) filed patent applications (whether granted or denied, and whether or not they were later withdrawn), (ii) issued patent numbers, (iii) applications for protection under the Plant Variety Protection Act (whether granted or not), and (iv) issued PVPA certificate numbers, for the following varieties of Monsanto field corn:

17. Documents constituting or sufficient to identify or describe your efforts to legally protect the intellectual property of the varieties of Monsanto field corn set forth in Request 16 that are not subject to patent or PVPA protection.

Visits by Wu Hougang

18. Documents and communications concerning visits by Wu Hougang to Monsanto's headquarters from January 1, 2007 through December 11, 2013, including on or about February 15, 2012.

Testing of Field Corn Seeds

19. Documents and communications concerning the testing of field corn seeds, whether purchased or otherwise, provided by the Government to you or provided by you to the Government in connection with the Mo Matter, including any and all test results, whether conclusive or not, and including any and all test protocols utilized or followed in connection with such testing.